

**DOCKET NUMBER: YOR920010520US1**

1 IN THE DRAWINGS

2 Fig. 2 is amended to include 'modem' 112.

3

**BEST AVAILABLE COPY**

**DOCKET NUMBER: YOR920010520US1**

## 1 REMARKS

2 These remarks follow the order of the paragraphs of the office  
3 action. Relevant portions of the office action are shown  
4 indented and italicized.

5 Claims 1-37 remain in the application. Claims 1, 29, 31, and 36  
6 are amended herein.

7 **DETAILED ACTION**

8 *[Office Action's] Response to Amendment* This is in  
9 response to amendment filed on 2/10/05 in which claims 1-37  
10 are pending.

11 **Claim Rejections - 35 USC § 112**

12 The following is a quotation of the second paragraph of 35 U.S.C.  
13 112: The specification shall conclude with one or more claims particularly  
14 pointing out and distinctly claiming the subject matter which the applicant  
15 regards as his invention.

16 Claim 31 recites the limitation "a client device" in line 15.  
17 Applicant needs to specify if this is the same client device as  
18 in line 11 or a second client device.

19 In response applicant respectfully states that claims 31 and 36  
20 are amended to change recurrence of 'a client device' to 'the  
21 client device', after the first time in claim 31. This overcomes  
22 the 35 USC 112 rejection.

23 **Drawings**

24 The drawings are objected to under 37 CFR 1.83(a). The  
25 drawings must show every feature of the invention specified in  
26 the claims. Therefore, the "telephone modem" must be shown or  
27 the feature(s) canceled from the claim(s). No new matter should  
28 be entered. Corrected drawing sheets in compliance with 37  
29 CFR 1.121(d) are required in reply to the Office action to  
30 avoid abandonment of the application. Any amended  
31 replacement drawing sheet should include all of the figures  
32 appearing on the immediate prior version of the sheet, even  
33 if only one figure is being amended. The figure or figure number  
34 of an amended drawing should not be labeled as "amended." If a

**Application/Control Number: 09/933,625**

**12/36**

## DOCKET NUMBER: YOR920010520US1

1 drawing figure is to be canceled, the appropriate figure must be  
2 removed from the replacement sheet, and where necessary, the  
3 remaining figures must be renumbered and appropriate changes  
4 made to the brief description of the several views of the  
5 drawings for consistency. Additional replacement sheets may be  
6 necessary to show the renumbering of the remaining figures. Each  
7 drawing sheet submitted after the filing date of an application  
8 must be labeled in the top margin as either "Replacement Sheet"  
9 or "New Sheet" pursuant to 37 CFR 1.121 (d). If the changes are  
10 not accepted by the examiner, the applicant will be notified  
11 and informed of any required corrective action in the next  
12 Office action. The objection to the drawings will not be  
13 held in abeyance.

14 In response applicant respectfully states that Fig. 2 is amended  
15 to show 'modem 112'. A complete set of drawings are included  
16 herewith. This overcomes the drawing objection under 37 CFR  
17 1.83(a)

18 **[Office Action's] Response to Arguments**

19 Applicant's arguments filed have been fully considered but  
20 they are not persuasive. Therefore, this case is made  
21 final.

22 As per claim 31, Applicant asserts that a client device  
23 could dial-in directly to a remote dial-up server attached to  
24 the home distribution network and the PSTN. However, Valencia  
25 clearly teaches a Network Access Server for receiving and  
26 processing data transmitted from the remote client (See col. 4,  
27 lines 15-21). Applicant is reminded that during patent  
28 examination, the claims are given the broadest reasonable  
29 interpretation. Applicant is interpreting the claims very narrow  
30 without considering the broad teaching of the references used in  
31 the rejection. It should be noted that the examiner is  
32 entitled to the broadest reasonable interpretation of the claims.

33 In response applicant respectfully states that a difference  
34 between Valencia and the current invention is beyond just the use  
35 of Network Access Server. Valencia specifically teaches  
36 "...establishing a second communication link between the ISP and  
37 the local area network..." (claim 1, column 15 lines 16-19; claim).  
38 An examination of the figures, the text, and claim 1 of Valencia  
39 one can easily notice that this two step process of connecting to

## DOCKET NUMBER: YOR920010520US1

1 two different devices is always present, e.g., Figure 3 shows a  
2 connection to a NAS and then a connection to the home gateway.  
3 Furthermore, these two necessary devices are located apart and  
4 are connected with each other via the Internet services provided  
5 by an ISP. This is not what is claimed in claim 31. Claim 31  
6 claims the use of a single apparatus via which a user in which a  
7 user client device can establish communication in one step (and  
8 not by connecting to two devices in two steps as Valencia  
9 teaches) with the dial-up server (and successively to the  
10 services accessible via the home network).

11 Claim 31 directly indicates that "said apparatus being a single  
12 apparatus through which a user with the user client device can  
13 establish communication in one step." Claim 31-is-also amended  
14 to indicate that, "said user connecting means employing only one  
15 of a cellular voice network and a PSTN." Thus claim 31 is  
16 allowable over the cited art

17 *As per claims 1 and 29, Applicant argues that Sharma's invention*  
18 *centers around a reactive system and network manager procedure,*  
19 *where first and error condition is detected and then the network*  
20 *manager takes actions to remedy this condition. However, Applicant*  
21 *failed to present argument showing were the Office reference*  
22 *does not meet the claimed language. The applicant is reminded*  
23 *of the clear difference between reading the claims in light of*  
24 *the specification and reading the limitations of the*  
25 *specification into the claims. Applicant cannot rely on the*  
26 *specification to impart to the claims limitations not recited*  
27 *therein.*

28 In response applicant respectfully states that the Applicant in  
29 response to the first office action, considered the entire  
30 paragraph [0019] on page 2 in Sharma's invention. However,  
31 apparently the Examiner extracted only portions of that paragraph  
32 that put together read as follows: "A system ... that enables a  
33 network manager ... to remotely manage network through mobile  
34 wireless capable devices." Applicant still believes though that  
35 the argument made was proper when the entire paragraph [0019]

## DOCKET NUMBER: YOR920010520US1

1 were to be considered. However, if only the specific portions of  
2 this paragraph were to be considered, the Applicant now realizes  
3 the point that the Office action is raising. Thus consideration  
4 of the complete paragraph shows that Sharma does not teach the  
5 invention of claim 31.

6 However, in the response to point (5.a) in the Office Action, the  
7 office action also mentions the teachings of Sawada as well. The  
8 Applicant still believes that Sawada's teachings do not cover the  
9 Applicant's invention as further argued next and therefore,  
10 together with the amended claims 1 and 29, the Applicant still  
11 respectfully disagrees with the point (5.a) that the Office  
12 action raises.

13 Claims 1 and 29 are further amended to indicate that it includes,  
14 "employing only one of a cellular voice network and a PSTN."  
15 Thus amended claims 1 and 29 are allowable over the cited art.

16 *Furthermore, Applicant argues that the list that the present*  
17 *invention claimed are lists for accessing services and not*  
18 *devices as Sawada teaches. This is not persuasive since the*  
19 *user is accessing the devices for the only purpose of*  
20 *accessing the services. Applicant is interpreting the*  
21 *claims very narrow without considering the broad teaching of the*  
22 *references used in the rejection. It should be noted that the*  
23 *examiner is entitled to the broadest reasonable interpretation*  
24 *of the claims.*

25 In response applicant respectfully states that while recognizing  
26 that one accesses a device for the only purpose to access the  
27 service that this device provides, the Applicant respectfully  
28 disagrees with the examiner that this is identical to accessing a  
29 service directly without first accessing a device. There is no  
30 reason to assume that there exists a one-to-one correspondence  
31 between a service and a device. While devices provide services, a  
32 single service can be implemented across multiple devices. For  
33 example, a "home theater service" may be implemented by

**DOCKET NUMBER: YOR920010520US1**

1 manipulating the lighting control, A/C control, audio control, TV  
2 control, lowering the projection screen control, and so on,  
3 devices. Some day, this service may even interact over the  
4 Internet with on-line video-on-demand servers and libraries to  
5 select the movie to watch through the home theater service - in  
6 other words, the location, type, ownership, and so on, of the  
7 devices supporting the service becomes immaterial. A preferred  
8 embodiment of this service will hide from the user all these  
9 elemental components of the service. It will not expose to  
10 him/her the devices that support the service but it would simple  
11 expose to him a menu/list of option specific to the home theater  
12 service itself. For this reason, the Applicant believes that  
13 providing access to a device is a fundamentally different concept  
14 to accessing a service. Sawada's invention deals exclusive with  
15 devices and how these devices are able to expose their control  
16 interfaces to terminal devices external of the home network.  
17 There exists no concept of services that can be "composed" across  
18 multiple devices and controlled remotely in any of Sawada's  
19 claims. Therefore the Applicant argues that the teachings of  
20 Sawada about accessing devices do not cover (even for the skilled  
21 in the art) the ramifications of accessing services instead.

**Claim Rejections - 35 USC § 102**

2. The following is a quotation of the appropriate paragraphs  
of 35 U.S.C. 102 that form the basis for the rejections under  
this section made in this Office action:

A person shall be entitled to a patent unless -- (e) the invention was  
described in (1) an application for patent, published under section 122(b), by  
another filed in the United States before the invention by the applicant for  
patent or (2) a patent granted on an application for patent by another filed in  
the United States before the invention by the applicant for patent, except that  
an international application filed under the treaty defined in section 351(a)  
shall have the effects for purposes of this subsection of an application filed  
in the United States only if the international application designated the United  
States and was published under Article 21 (2) of such Treaty in the English  
language.

3. Claims 31, 36-37 are rejected under 35 U.S.C. 102(e) as  
being anticipated by U.S. Patent No. 6,308,213 to Valencia.

**Application/Control Number: 09/933,625****16/36**



## DOCKET NUMBER: YOR920010520US1

1 a. As per claim 31, Valencia teaches an apparatus attaches on  
 2 a home network for a user using a client device attached to a  
 3 wireless, circuit-switched, voice telephony network, to interact  
 4 with at least one service on said home network, said apparatus  
 5 comprising: a telephone modem to directly receive an incoming  
 6 call from a client device, and also to receive and transmit data  
 7 over a telephone network, said telephone modem having a client  
 8 port through which the apparatus attaches to the telephone  
 9 network (See col. 3, lines 44-47 and col. 4, lines 14-38) (The  
 10 remote client is coupled to the ISP that accesses the  
 11 Internet infrastructure via a PSTN ... The network access  
 12 server NAS includes a modem for receiving and processing data  
 13 transmitted from the remote client) ; a dial-in service module  
 14 to implement dial-in logic for the client device; a browser  
 15 server module for managing data for remote display; ; and a  
 16 protocol transport module to implement protocols needed to  
 17 transport data back and forth between a browser application  
 18 in the client device and a browser server module (See col.  
 19 3, lines 60-67 and col. 4, lines 1-14) ( the remote client  
 20 accesses the Local Area Network through the dial-up session. ..  
 21 and the remote client can access any of the resources on the LAN  
 22 ... the dial-up session uses a L2F protocol to project a point-to  
 23 point link level session).

24 aaaaaaaaaaaaaaaaaaaaaaaaaaaaaaaaaawwwwwwww

25 b. As per claim 36, Valencia teaches the claimed invention as  
 26 described above. Furthermore, Valencia teaches wherein said  
 27 dial-in server module triggers at least one particular module  
 28 in the apparatus to process any incoming calls and requests  
 29 from a client device (See col. 2, lines 10-19).

30 In response, applicants respectfully state that the cited  
 31 reference (col. 2, ln. 10-19) describes the fact that the client  
 32 device after it connects to the home gateway, it can be managed  
 33 through databases controlled by the local network (i.e., a  
 34 control path direction from the home network to the client, which  
 35 is opposite to what claim 36 of our invention implies).

36 Furthermore, the cited reference states that the client device  
 37 gains access to resources. There is no reference to what these  
 38 resources are and we contend that someone skilled in the art  
 39 would not find in the cited reference that "...said dial-in  
 40 server module triggers at least one particular module in the  
 41 apparatus..." Thus claim 36 is allowable over the cited art.





**DOCKET NUMBER: YOR920010520US1**

1 action. Sawada's invention apparently teaches about controlling  
2 network devices, which, in particular, make use of the IEEE 1394  
3 serial bus for communication (col. 4, ln. 5-8). Contrary,  
4 invention claimed in office action0., is directed to controlling  
5 services independently from devices (if any) that are involved in  
6 support of these services or the communication protocols are  
7 used for communicating to the implementors (being software  
8 modules or networked devices) of these services. Therefore the  
9 lists that the present invention claimed in office action0 refer  
10 to are lists for accessing services and not devices as Sawada  
11 teaches.

12 As a result, applicants do not share the office action's view  
13 that that it would have been obvious to one with ordinary skill  
14 in the art at the time the invention was made to incorporate the  
15 use of lists as taught by Sawada, in the claimed invention of  
16 Sharma in order to make remotely control home network devices  
17 available using wide-area network such as the Internet. This is  
18 because a person with ordinary skills will not have been able to  
19 create services and access and control these services and obtain  
20 the results of the elements of claims 1-3, 5-8, 10, 12,  
21 15-22,24,27-30 without the present invention, just starting from  
22 lists that control IEEE 1394-compliant devices.

23 Furthermore, claim 1, underscores this aspect of our invention.  
24 Claim 1 is amended to be directed to , "a home data distribution  
25 network, said home data distribution network comprising an  
26 aggregation of at least one communications media and at least one  
27 communications protocol used to access said at least one remote  
28 service from a serving entity," and having a limitation,  
29 "selecting said at least one communications media and at least  
30 one communications protocol that said selected at least one  
31 service uses." The additional clarifications in this claim is

## DOCKET NUMBER: YOR920010520US1

1 described in col. 2, paragraph 20 of the present invention  
2 09/933,625 (US Patent Application US2003/0041119 A1). This  
3 paragraph describes that the home distribution network comprises  
4 an aggregation of at least one communications and communications  
5 protocols, and therefore to access a service attached to the home  
6 network the step of selecting at least one communications media  
7 and at least one communications protocol has to occur. This  
8 aggregation of networks and protocols and as a consequence the  
9 step of selecting at least one is not taught by either Sharma nor  
10 Sawadan. Thus claim 31 is allowable over the cited art. Claims  
11 32-37, which depend on claim 21 thereon are allowable in  
12 themselves and because each ultimately depends on an allowable  
13 claim.

14 Likewise, claim 29 includes, "second connecting means for  
15 attaching said apparatus to a communications medium and using a  
16 communications protocols, taken from an aggregation of  
17 communication media and protocols, through which said at least  
18 one remote service can be accessed," and "second selecting means  
19 for selecting the communications medium and protocol to access  
20 said selected at least one service." Furthermore claim 29 is  
21 amended herein. Thus claim 29 is allowable.

22 *b. As per claim 2, Sharma teaches the claimed invention as described*  
23 *above. Furthermore, Sharma teaches wherein the client device*  
24 *is portable (See page 3, paragraph [0037]). c. As per claim*  
25 *3, Sharma teaches the claimed invention as described above.*  
26 *Furthermore, Sharma teaches wherein the client device is a*  
27 *cellular telephone (See page 3, paragraph [0037]).*

28 *d As per claim 5, Sharma teaches the claimed invention as*  
29 *described above. Furthermore, Sharma teaches wherein the*  
30 *viewing is performed employing a viewing device collocated*  
31 *with said client device (See page 3, paragraph [0037]).*

32 *e. As per claim 6, Sharma teaches the claimed invention as*  
33 *described above, Furthermore, Sharma teaches wherein the*  
34 *viewing device depicts information. in a form including at*

Application/Control Number: 09/933,625

20/36

## DOCKET NUMBER: YOR920010520US1

1 least one of text, graphics, images, light display, or any  
2 combination of these (See page 3, paragraph [0037]) (Remark:  
3 It is inherent that the mobile device depicts information in  
4 at least one or more these forms in order to manage the  
5 network assets).

6 In response, applicants respectfully state claims 2, 5 and 6 are  
7 dependent claims that depends on allowable claim 1, and are  
8 therefore allowable. Furthermore, it is not inherent that a  
9 mobile device will depict information in at least one or more of  
10 these forms as in these claims - which are indeed not about  
11 managing network assets as Sharma teaches. For example, the use  
12 of LEDs as light displays for is not necessarily an inherent  
13 feature of a network management mobile device. Examiner is  
14 requested to provide backup for this so-called inherentcy.

15 Furthermore claim 6 is amended to include voice, to better  
16 protect the invention.

17 As per claim 7, Sharma teaches the claimed invention as  
18 described above. However, Sharma fails to teach wherein the  
19 step of selecting includes employing a menu.

20 Sawada teaches wherein the step of selecting includes  
21 employing a menu (See col. 2, lines 1-2).

22 It would have been obvious to one with ordinary skill in the  
23 art at the time the invention was made to incorporate  
24 wherein the step of selecting includes employing a menu as  
25 taught by Sawada in the claimed invention of Sharma in order  
26 to allow the user to exercise concentrated control over the  
27 home network devices through the homepage list and remotely  
28 control the home network devices via the homepage (See col.  
29 2, lines 3-6).

30 g. As per claim 8, Sharma teaches the claimed invention as  
31 described above. However, Sharma teaches wherein the step of  
32 viewing is performed employing a web- browser and the  
33 serving entity is a web-server.

34 Sawada teaches wherein the step of viewing is performed  
35 employing a web- browser and the serving entity is a

**DOCKET NUMBER: YOR920010520US1**

1 web-server (See col. 2, lines 45-52 and col. 4, lines  
2 35-41).

3 It would have been obvious to one with ordinary skill in the  
4 art at the time the invention was made to incorporate the  
5 step of viewing is performed employing a web- browser and  
6 the serving entity is a web-server as taught by Sawada in  
7 the claimed invention of Sharma in order to allow the user  
8 to exercise concentrated control over the home network  
9 devices trough the homepage list and remotely control the  
10 home network devices via the homepage (See col. 2, lines  
11 3-6).

12 h. As per claim 10, Sharma teaches the claimed invention as  
13 described above. Furthermore, Sharma teaches wherein the  
14 data network is the Intranet controlled by an Internet  
15 Service Provider (See page 14, paragraph [0153]).

16 In response, applicants respectfully state claims 7, 8, and 10  
17 are dependent claims that depends on allowable claim 1, and are  
18 therefore allowable. Furthermore, the cited reference (Sharma,  
19 paragraph [0153] on page 14) gives a collection of network  
20 examples, however, none of them states that the network is an  
21 Intranet controlled by an ISP.

22 i. As per claim 12, Sharma teaches the claimed invention as  
23 described above. Furthermore, Sharma teaches serving entity  
24 employing attributes of said circuit switch network in  
25 authenticating said user (See page 7, paragraph [0061]).

26 j. As per claim 15, Sharma teaches the claimed invention as  
27 described above. Furthermore, Sharma teaches establishing  
28 credentials so that said at least one remote service can be  
29 manipulated in a secure manner on the serving entity (See  
30 page 3-4, paragraph [0092]).

31 In response, applicants respectfully state claim 12 is a  
32 dependent claim that depends on allowable claim 1, and is  
33 therefore allowable. Furthermore, the cited reference (Sharma,  
34 paragraph [0092] on pages 3-4), refers to the use of ACLs  
35 organized in a hierarchy database and provide access privileges  
36 and permissions to network assets. Our claim focuses on  
37 manipulating a remote service in a secure manner. Access control

**DOCKET NUMBER: YOR920010520US1**

1 defines who is authorized of accessing a resource and it does not  
2 necessarily imply that a resource can be manipulated and  
3 particularly in a secure manner, which may involve encryption of  
4 communication to and from the manipulated asset.

5 *k. As per claim 16, Sharma teaches the claimed invention as*  
6 *described above. -*

7 *Furthermore, Sharma teaches wherein the step of viewing*  
8 *views the list on a viewing device in a manner that depends*  
9 *on the user's access privileges to said at least one remote*  
10 *service (See pages 3- 4, paragraph [0092]).*

11 *l. As per claim 17, Sharma teaches the claimed invention as*  
12 *described above. Furthermore, Sharma teaches the serving*  
13 *entity providing access to at least one service agent used*  
14 *to access and control said at least one remote service.*

15 In response, applicants respectfully state claims 16 and 17 are  
16 dependent claims that depends on allowable claim 1, and are  
17 therefore allowable. Furthermore, the applicants contend that  
18 Sharma apparently does not teach the use of service agents for  
19 accessing and controlling the said remote services. It may teach  
20 a network management system that has a connection path to a  
21 network asset but not of providing access to a service agent to  
22 access and control the network asset.

23 *m. As per claim 18, Sharma in view of Sawada teaches the*  
24 *claimed invention as described above. Furthermore, Sharma*  
25 *teaches wherein at least one of said at least one service*  
26 *agent is a computer software module executable on a computer*  
27 *(See page 6, paragraph [0052]).*

28 In response, applicants respectfully state claim 12 is a  
29 dependent claim that depends on allowable claim 1, and is  
30 therefore allowable. Furthermore, the applicants contend that  
31 Sharma in view of Sawada does not teach the use of service agents  
32 that are software modules that are executed on a computer. In  
33 particular, the cited reference (Sharma paragraph [0052] on page  
34 6) teaches about use of a PAN to connect to a network asset and

## DOCKET NUMBER: YOR920010520US1

1 provide network management capability over the PAN, however, it  
2 does not apparently teach the use of a service agent of any kind.

3 n. As per claim 19, Sharma in view of Sawada teaches the  
4 claimed invention as described above. Furthermore, Sharma  
5 teaches activating said software module prior to invoking a  
6 particular remote service (See page 6, paragraph [0052]).

7 In response, applicants respectfully state claim 12 is a  
8 dependent claim that depends on allowable claim 1, and is  
9 therefore allowable. Furthermore, the applicants contend that  
10 Sharma in view of Sawada does not teach the use of service agents  
11 that are software modules that are executed on a computer. In  
12 particular, the cited reference (Sharma paragraph [0052] on page  
13 6) teaches of about the use of a PAN to connect to a network  
14 asset and provide network management capability over the PAN,  
15 however, it does not teach the use of a service agent of any  
16 kind.

17 o. As per claim 20, Sharma in view of Sawada teaches the  
18 claimed invention as described above. Furthermore, Sharma  
19 teaches activating said software module on demand after a  
20 particular remote service has been invoked (See page 6,  
21 paragraph [0054]). .

22 In response, applicants respectfully state that claim 20 is a  
23 dependent claim that depends on claim 18 and ultimately on claim  
24 1 and is therefore allowable. Furthermore, the applicants contend  
25 that Sharma in view of Sawada does not teach the use of service  
26 agents that are software modules that are executed on a computer.  
27 In particular, the cited reference (Sharma paragraph [0054] on  
28 page 6) teaches of a PAN network configuration for accessing  
29 network assets, however, it does not teach activating said  
30 software module on demand after a particular remote service has  
31 been invoked. Claim 20 is also therefore allowable.

32 p. As per claim 21, Sharma in view of Sawada teaches the  
33 claimed invention as -



**DOCKET NUMBER: YOR920010520US1**

1       described above. Furthermore, Sharma teaches storing said  
2       software module at a data repository (See page 8, paragraph  
3       [0068]).

4       In response, applicants respectfully state that claim 21 is a  
5       dependent claim that depends on claim 18 and ultimately on claim  
6       1 and is therefore allowable. Furthermore, the applicants contend  
7       that Sharma in view of Sawada does not teach that [service agent]  
8       software modules are stored in a data repository. In particular,  
9       the cited reference (Sharma paragraph [0068] on page 8) teaches a  
10      distributed fault propagation and notification system, however,  
11      it does not teach storing said software module at a data  
12      repository.

13       q. As per claim 22, Sharma in view of Sawada teaches the  
14       claimed invention as described above. Furthermore, Sharma  
15       teaches dynamically retrieving and activating said software  
16       module from the data repository after invoking a particular  
17       remote service (See page 6, paragraph [0054-0055]).

18      In response, applicants respectfully state that claim 20 is a  
19      dependent claim that depends on claim 18 and ultimately on claim  
20      1 and is therefore allowable. Furthermore, the applicants contend  
21      that Sharma in view of Sawada does not teach dynamically  
22      retrieving and activating said [service agent] software module  
23      from the data repository after invoking a particular remote  
24      service. In particular, the cited reference (Sharma paragraph  
25      [0054-0055] on pages 6 and 7) refers to different network  
26      management topologies, however, it does not teach dynamically  
27      retrieving and activating said [service agent] software module  
28      from the data repository after invoking a particular remote  
29      service.

30       r. As per claim 24, Sharma et al in view of Sawada teaches  
31       the claimed invention as described above. Furthermore,  
32       Sharma fails to teach wherein said wireless, circuit-  
33       switched, voice telephony network is a second generation,  
34       digital, cellular network (See page 3, paragraph [0037]).

**DOCKET NUMBER: YOR920010520US1**

1 In response, applicants respectfully state claim 24 is a  
2 dependent claim that depends on allowable claim 1, and is  
3 therefore allowable. Furthermore, the applicants agree with the  
4 examiner's statement "...Sharma fails to teach..." showing the  
5 examiner appears to be in agreement with the applicants regarding  
6 this claim. Thus this claim is apparently not rejected.

7 *s. As per claim 27, Sharma teaches the claimed invention as*  
8 *described above. Furthermore, Sharma teaches an article of*  
9 *manufacture comprising a computer usable medium having*  
10 *computer readable program code means embodied therein for*  
11 *causing a user to interact with at least one remote service,*  
12 *the computer readable program code means in said article of*  
13 *manufacture comprising computer readable program code means*  
14 *for causing a computer to effect the steps of claim 1 (See*  
15 *page 3, paragraph [0052- 0054]).*

16 In response, applicants respectfully state claim 27 is a  
17 dependent claim that depends on allowable claim 1, and is  
18 therefore allowable. Furthermore, the applicants do not fully  
19 understand the examiner's statement "... (See page 3, paragraph  
20 [0052-0054]) " as these paragraphs are not on page 3 and they  
21 refer to different network management topologies that are  
22 applicable to Sharma's invention and not about an article of  
23 manufacture.

24 *t. As per claim 28, Sharma et al teaches the claimed*  
25 *invention as described above. -*  
26 *Furthermore, Sharma et al teaches a program storage device*  
27 *readable by machine, tangibly embodying a program of*  
28 *instructions executable by the machine to perform method*  
29 *steps for causing a user to interact with at least one*  
30 *remote service, said method steps comprising the steps of*  
31 *claim 1 (See page 3, paragraph [0052-0054]).*

32 In response, applicants respectfully state claim 28 is a  
33 dependent claim that depends on allowable claim 1, and is  
34 therefore allowable. Furthermore, the applicants do not fully  
35 understand the examiner's statement "... (See page 3, paragraph  
36 [0052-0054])." as these paragraphs are not on page 3 and they

## DOCKET NUMBER: YOR920010520US1

1 refer to different network management topologies that are  
2 applicable to Sharma's invention and not about a program storage  
3 device.

4 v. As per claim 30, Sharma et al in view of Sawada teaches  
5 the claimed invention as described. Furthermore, Sharma et  
6 al teaches a computer program product comprising a computer  
7 usable medium having computer readable program code means  
8 embodied therein for causing a user to interact with at  
9 least one remote service, the computer readable program code  
10 means in said computer program product comprising computer  
11 readable program code means for causing a computer to effect  
12 the functions of claim 28 (See page 3, paragraph  
13 [0052-0054]).

14 In response, applicants respectfully state claim 30 is a  
15 dependent claim that ultimately depends on allowable claim 1, and  
16 is therefore allowable. Furthermore, the applicants do not fully  
17 understand the examiner's statement "... (See page 3, paragraph  
18 [0052-0054])." as these paragraphs are not on page 3 and they  
19 refer to different network management topologies that are  
20 applicable to Sharma's invention and not about a computer usable  
21 program.

22 6. Claims 4, 9, 11, 13-14, 23 and 25- 26 are rejected under 35  
23 U.S.C. 103(a) as being unpatentable over U.S. Patent  
24 Application No. 2002/0068559 to Sharma et al in view of U.S.  
25 Patent No. 6,735,619 to Sawada as applied to claim 1 above,  
26 and further in view of U.S. Patent No. 6,308,213 to  
27 Valencia.

28 a. As per claim 4, Sharma et al in view of Sawada teaches  
29 the claimed invention as described above. However, Sharma et  
30 al in view of Sawada fails to teach wherein the step of  
31 connecting includes dialing-up directly to the serving  
32 entity.

33 ~~Valencia teaches a wherein the step of connecting includes~~  
34 dialing-up directly to the serving entity (See col. 2, lines  
35 5-10).

36 It would have been obvious to one with ordinary skill in the  
37 art at the time the invention was made to incorporate  
38 wherein the step of connecting includes dialing-up directly

Application/Control Number: 09/933,625

27/36

## DOCKET NUMBER: YOR920010520US1

1 to the serving entity as taught by Valencia in the claimed  
2 invention of Sharma et al in view of Sawada in order to  
3 access a private local network through an internet access  
4 service (See col. 1, lines 11-12).

5 In response, applicants respectfully state claims 4, 9, 11,  
6 13-14, 23 and 25- 26 are dependent claims that depends on  
7 allowable claim 1, and are therefore allowable. Furthermore, the  
8 cited reference to Valencia (col. 2, ln. 5-10) teaches about a  
9 direct dial-up between the NAS and the home gateway and not a  
10 direct dial-up between the user and his client device and the  
11 serving entity. The presence of the NAS in between the remote  
12 client and the home gateway is an aspect of Valencia's invention  
13 that results from the necessary existence of an ISP between the  
14 client device and the home gateway. As discussed in our response  
15 to 3.a above, the presence of ISP is not a required aspect of our  
16 invention.

17 b. As per claim 9, Sharma et al in view of Sawada teaches  
18 the claimed invention as described above. However, Sharma et  
19 al in view of Sawada fails to teach wherein the step of  
20 connecting includes dialing-up to the serving entity through  
21 a data network to which the serving entity is connected.

22 Valencia teaches wherein the step of connecting includes  
23 dialing-up to the serving entity through a data network to  
24 which the serving entity is connected (See col. 2, lines  
25 11-19).

26 It would have been obvious to one with ordinary skill in the  
27 art at the time the invention was made to incorporate  
28 wherein the step of connecting includes dialing-up to the  
29 serving entity through a data network to which the serving  
30 entity is connected as taught by Valencia in the claimed  
31 invention of Sharma et al in view of Sawada in order to  
32 access a private local network through an internet access  
33 service (See col. 1, lines 11-12).

34 In response, applicants respectfully state claim 9 is a dependent  
35 claim that depends on allowable claim 1, and is therefore  
36 allowable. Furthermore, the cited reference to Valencia (col. 2,  
37 ln. 11-19) teaches about the use of the L2F and PPP protocols and

**DOCKET NUMBER: YOR920010520US1**

1 that the client device could be managed by databases eventually  
2 creating the illusion of a direct dial-up connection (although  
3 not a real, physical dial-up connection). These aspects of  
4 Valencia's invention are not applicable to our invention that  
5 does not requires the use of any databases to manage the client  
6 device.

7 c. As per claim 11, Sharma et al in view of Sawada teaches  
8 the claimed invention as described above. Furthermore,  
9 Sharma et al teaches wherein the data network uses the  
10 TCP/IP protocol suite for transporting information (See page  
11 9, paragraph [0076]).

12 In response, applicants respectfully state claim 11 is a  
13 dependent claim that depends on allowable claim 1, and is  
14 therefore allowable. Furthermore, the cited reference to Sharma  
15 (paragraph [0076] on page 9) teaches (or to be more precise,  
16 implies) about the use of Internet protocols on the network  
17 between the NMS and the network assets and not the network  
18 between the client device and the serving entity (or the NMS in  
19 Sharma's case).

20 d. As per claim 13, Sharma et al in view of Sawada teaches  
21 the claimed invention as described above. However, Sharma et  
22 al in view of Sawada fails to teach wherein said attributes  
23 include a telephone number of said client device.

24 Valencia teaches wherein said attributes include a telephone  
25 number of said client device (See col. 4, lines 15-23).

26 It would have been obvious to one with ordinary skill in the  
27 art at the time the invention was made to incorporate  
28 wherein said attributes include a telephone number of said  
29 client device as taught by Valencia in the claimed invention  
30 of Sharma et al in view of Sawada in order to access a  
31 private local network trough an internet access service (See  
32 col. 1, lines 11-12).

33 In response, applicants respectfully state claim 13 is a  
34 dependent claim that depends on allowable claim 1, and is  
35 therefore allowable. Furthermore, the cited reference to Valencia

## DOCKET NUMBER: YOR920010520US1

1 (col. 4, ln. 15-23) teaches of a direct dial-up connection  
2 between the client device and the NAS and the use of the LCP  
3 packets of the PPP protocol to test this data link. This  
4 reference does not teach using a telephone number of a client  
5 device as a means of authenticating a user directly by the  
6 serving entity.

7 e. As per claim 14, Sharma et al in view of Sawada teaches  
8 the claimed invention as described above. However, Sharma et  
9 al in view of Sawada fails to teach wherein said attributes  
10 include a telephone number of said serving entity.

11 Valencia teaches wherein said attributes include a telephone  
12 number of said serving entity (See col. 4, lines 15-23).

13 It would have been obvious to one with ordinary skill in the  
14 art at the time the invention was made to incorporate  
15 wherein said attributes include a telephone number of said  
16 serving entity as taught by Valencia in the claimed  
17 invention of Sharma et al in view of Sawada in order to  
18 access a private local network through an internet access  
19 service (See col. 1, lines 11-12).

20 In response, applicants respectfully state claim 14 is a  
21 dependent claim that depends on allowable claim 1, and is  
22 therefore allowable. Furthermore, the cited reference to Valencia  
23 (col. 4, ln. 15-23) teaches of a direct dial-up connection  
24 between the client device and the NAS and the use of the LCP  
25 packets of the PPP protocol to test this data link. This  
26 reference does not teach using a telephone number of a serving  
27 entity as a means of authenticating a user directly by the  
28 serving entity.

29 f. As per claim 23, Sharma et al teaches the claimed  
30 invention as described above. However, Sharma fails to teach  
31 wherein said wireless, circuit-switched, voice telephony  
32 network is a first generation, analog, cellular network.

33 Valencia teaches wherein said wireless, circuit-switched,  
34 voice telephony network is a first generation, analog,  
35 cellular network (See col. 3, lines 44-47).



## DOCKET NUMBER: YOR920010520US1

1 It would have been obvious to one with ordinary skill in the  
2 art at the time the invention was made to incorporate  
3 wherein said wireless, circuit-switched, voice telephony  
4 network is a first generation, analog, cellular network as  
5 taught by Valencia in the claimed invention of Sharma et al  
6 in view of Sawada in order to access a private local network  
7 through an internet access service (See col. 1, lines 11-12).

8 In response, applicants respectfully state claim 23 is a  
9 dependent claim that depends on allowable claim 1, and is  
10 therefore allowable. Furthermore, the cited reference to Valencia  
11 (col. 3, ln. 44-47) teaches of a client device coupled to the NAS  
12 of an ISP that accesses the Internet infrastructure using the  
13 PSTN. However, the cited reference to Valencia does not teach  
14 about the use of a first generation analog, cellular network --  
15 this network is an entirely distinct network to Valencia's PSTN.

16 g. As per claim 25, Sharma et al teaches the claimed  
17 invention as described above. However, Sharma et al in view  
18 of Sawada fails to teach wherein the step of dialing-up  
19 directly to the service entity further includes passing  
20 dialing signaling and control data to the serving entity  
21 through an intermediary data network.

22 Valencia teaches wherein the step of dialing-up directly to  
23 the service entity further includes passing dialing  
24 signaling and control data to the serving entity through an  
25 intermediary data network (See col. 3, lines 44-54).

26 It would have been obvious to one with ordinary skill in the  
27 art at the time the invention was made to incorporate  
28 wherein the step of dialing-up directly to the service  
29 entity further includes passing dialing signaling and  
30 control data to the serving entity through an intermediary  
31 data network as taught by Valencia in the claimed invention  
32 of Sharma et al in view of Sawada in order to access a  
33 private local network through an internet access service (See  
34 col. 1, lines 11-12).

35 In response, applicants respectfully state claim 25 is a  
36 dependent claim that depends on allowable claim 1, and is

## DOCKET NUMBER: YOR920010520US1

1 therefore allowable. Furthermore, applicants dispute the  
2 obviousness based on non-related art.

3 h. As per claim 26, Sharma et al teaches the claimed  
4 invention as described above. However, Sharma et al in view  
5 of Sawada fails to teach wherein the step of dialing-up to  
6 the serving entity through a data network, further includes  
7 dialing-up to the serving entity through a sequence of at  
8 least one data network, the last one of which the serving  
9 entity is attached to.

10 Valencia teaches wherein the step of dialing up to the  
11 serving entity through a data network, further includes  
12 dialing-up to the serving entity through a sequence of at  
13 least one data network, the last one of which the serving  
14 entity is attached to (See col. 3, lines 60-67 and col. 4,  
15 lines 1-14).

16 It would have been obvious to one with ordinary skill in the  
17 art at the time the invention was made to incorporate  
18 wherein the step of dialing-up to the serving entity through  
19 a data network, further includes dialing-up to the serving  
20 entity through a sequence of at least one data network, the  
21 last one of which the serving entity is attached to as  
22 taught by Sharma et al in the claimed invention of Valencia  
23 in order to access a private local network through an  
24 internet access service (See col. 1, lines 11-12).

25 In response, applicants respectfully state claim 26 is a  
26 dependent claim that depends on an allowable claim, and is  
27 therefore allowable. Furthermore, the cited reference to Valencia  
28 (col. 3, ln. 60-67 and col. 4, ln. 1-14) fails, we contend, to  
29 teach or make obvious the use of multiple data networks between  
30 the client device and the serving entity, as our invention does  
31 (paragraph [0025] on page 3).

32 7. Claims 32-35 are rejected under 35 U.S.C. 103(a) as being  
33 unpatentable over U.S. Patent No. 6,708,213 to Valencia in  
34 view of US. Patent No. 6,735,619 to Sawada.

35 a. As per claim 32, Valencia teaches the claimed invention  
36 as described above. However, Valencia fails to teach wherein  
37 said browser server is used to obtain, organize, and

## DOCKET NUMBER: YOR920010520US1

1 manipulate data received from and data sent to the client  
2 device through the protocol transport module.

3 Sawada teaches wherein said browser server is used to  
4 obtain, organize, and manipulate data received from and data  
5 sent to the client device through the protocol transport  
6 module (See col. 2, lines 44-52).

7 It would have been obvious to one with ordinary skill in the  
8 art at the time the invention to incorporate wherein said  
9 browser server is used to obtain, organize, and manipulate  
10 data received from and data sent to the client device  
11 through the protocol transport module in order to make it  
12 easy to control home network devices (See col. 2, lines  
13 60-63).

14 In response, applicants respectfully state claim 32 is a  
15 dependent claim that depends on an allowable claim, and is  
16 therefore allowable. Furthermore, the cited reference to Sawada  
17 (col. 2, ln. 44-52) teaches using an apparatus with a WWW browser  
18 (our invention does not require the use of a WWW browser) to  
19 instruct the home network gateway apparatus to send control  
20 information to a home network device to execute an operation. The  
21 cited reference does teach using a browser server to obtain,  
22 organize, and manipulate data received from and data sent to the  
23 client device through the protocol transport module.

24 b. As per claim 33, Valencia teaches the claimed invention  
25 as described above. However, Valencia fails to teach wherein  
26 said data sent to the client device are displayed and viewed  
27 by the browser application in the client device.

28 Sawada teaches fails to teach wherein said data sent to the  
29 client device are displayed and viewed by the browser  
30 application in the client device (See col. 1, lines 39- 42).

31 It would have been obvious to one with ordinary skill in the  
32 art at the time the invention was made to incorporate fails  
33 to teach wherein said data sent to the client -  
34 device are displayed and viewed by the browser application  
35 in the client device as taught by Sawada in the claimed  
36 invention of Valencia in order to make it easy to control  
37 home network devices (See col. 2, lines 60-63).

## DOCKET NUMBER: YOR920010520US1

1 In response, applicants respectfully state claim 33 is a  
2 dependent claim that depends on an allowable claim, and is  
3 therefore allowable. Furthermore, the applicants agree with the  
4 examiner's statement "...Sawada teaches fails to teach...", and  
5 dispute the obviousness.

6 c. As per claim 34, Valencia teaches the claimed invention  
7 as described above. However, Valencia fails to teach wherein  
8 said data sent includes a list of services that are  
9 accessible by the client device.

10 Sawada teaches wherein said data sent includes a list of  
11 services that are accessible by the client device (See col.  
12 1, lines 39-42)

13 It would have been obvious to one with ordinary skill in the  
14 art at the time the invention was made to incorporate  
15 wherein said data sent includes a list of services that are  
16 accessible by the client device as taught by Sawada in the  
17 claimed invention of Valencia in order to make it easy to  
18 control home network devices (See col. 2, lines 60- 63).

19 In response, applicants respectfully state claim 34 is a  
20 dependent claim that depends on an allowable claim, and is  
21 therefore allowable. Furthermore, the cited reference to Sawada  
22 (col. 1, ln. 39-42) teaches displaying a list of home network  
23 devices on the display of the client device. However, displaying  
24 a device does not imply that a service (which is what our  
25 invention focuses on instead of simply devices) is accessible by  
26 the device. Displaying the existence of, for example, an  
27 air-conditioning service in a house, does not mean that one can  
28 also access the service and change its operation. This is what  
29 our invention means by accessing, and this is not taught, we  
30 believe, by the cited reference to Sawada.

31 d. As per claim 35, Valencia teaches the claimed invention  
32 as described above. However, Valencia fails to teach wherein  
33 said data received by the browser application in the client  
34 device include a selection of at least one service the user  
35 of the client device controls and an action to be taken for  
36 a selected service, and upon receipt of the action the

Application/Control Number: 09/933,625

34/36

## DOCKET NUMBER: YOR920010520US1

1 browser server interacts with a particular service agent to  
2 implement the control logic for controlling the selected  
3 service, wherein a control signal generated by the service  
4 agent exits the apparatus through the client port.

5 Sawada teaches wherein said data received by the browser  
6 application in the client device include a selection of at  
7 least one service the user of the client device controls and  
8 an action to be taken for a selected service, and upon  
9 receipt of the action the browser server interacts with a  
10 particular service agent to implement the control logic for  
11 controlling the selected service, wherein a control signal  
12 generated by the service agent exits the apparatus through  
13 the client port (See col. 2, lines 27-52).

14 It would have been obvious to one with ordinary skill in the  
15 art at the time the invention was made to incorporate  
16 wherein said data received by the browser application in the  
17 client device include a selection of at least one service  
18 the user of the client device controls and an action to be  
19 taken for a selected service, and upon receipt of the action  
20 the browser server interacts with a particular service  
21 agent to implement the control logic for controlling the  
22 selected service, wherein a control signal generated by the  
23 service agent exits the apparatus through the client port as  
24 taught by Sawada in the claimed invention of Valencia in  
25 order to make remotely control home network devices  
26 available using wide-area network such as the Internet (See  
27 col. 1, lines 30-34).

28 In response, applicants respectfully state claim 35 is a  
29 dependent claim that depends on an allowable claim, and is  
30 therefore allowable. Furthermore, the cited reference to Sawada  
31 (col. 2, ln. 27-52) fails to teach, we contend, the use of  
32 service agents with which the browser server interacts to adjust  
33 the behavior the service controlled by the service agent.

34 Claims 1-37 remain in the application. Claims 1, 29, 31, and 36  
35 are amended herein. Thus these claims and all claims that depend  
36 upon these claims are allowable over the cited art. Thus, claims  
37 1-37 are allowable.

## DOCKET NUMBER: YOR920010520US1

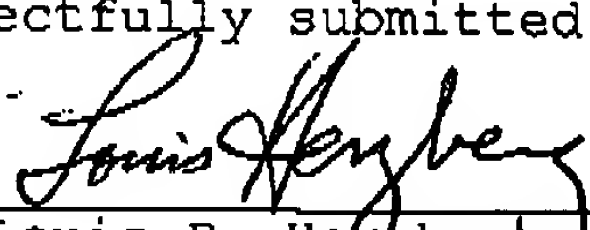
1 A listing of the claims is provided as required in the new USPTO  
2 amendment practice per 37 CFR 1.121.

3 It is anticipated that this amendment brings the application to  
4 allowance of all the claims. Favorable action is respectfully  
5 solicited. In the unlikely event that any claim remains  
6 rejected, please contact the undersigned by phone in order to  
7 discuss the application.

8 Please charge any fee necessary to enter this paper to deposit  
9 account 50-0510.

10 Respectfully submitted,

11 By:

  
Dr. Louis P. Herzberg  
Reg. No. 41,500  
Voice Tel. (845) 352-3194  
Fax. (914) 945-3281

12  
13  
14  
15  
16 3 Cloverdale Lane  
17 Monsey, NY 10952

18 Customer Number: 54856



**This Page is Inserted by IFW Indexing and Scanning  
Operations and is not part of the Official Record**

**BEST AVAILABLE IMAGES**

Defective images within this document are accurate representations of the original documents submitted by the applicant.

Defects in the images include but are not limited to the items checked:

☐ **BLACK BORDERS**

☐ **IMAGE CUT OFF AT TOP, BOTTOM OR SIDES**

☒ **FADED TEXT OR DRAWING**

☐ **BLURRED OR ILLEGIBLE TEXT OR DRAWING**

☐ **SKEWED/SLANTED IMAGES**

☐ **COLOR OR BLACK AND WHITE PHOTOGRAPHS**

☐ **GRAY SCALE DOCUMENTS**

☐ **LINES OR MARKS ON ORIGINAL DOCUMENT**

☐ **REFERENCE(S) OR EXHIBIT(S) SUBMITTED ARE POOR QUALITY**

☐ **OTHER:** \_\_\_\_\_

**IMAGES ARE BEST AVAILABLE COPY.**

**As rescanning these documents will not correct the image problems checked, please do not report these problems to the IFW Image Problem Mailbox.**